NOVEMBER 14, 2007

CLERK, U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANNA-KATRINA S. CHRISTAKIS,	07 C 6464
Plaintiff,	
vs.	
ALLIED COLLECTION SERVICES, INC.,	JUDGE PALLMEYER
Defendant.	MAGISTRATE JUDGE VALDEZ

COMPLAINT

INTRODUCTION

1. Plaintiff Anna-Katrina S. Christakis brings this action to secure redress from unlawful credit and collection practices engaged in by defendant Allied Collection Services, Inc.. Plaintiff alleges violation of the Fair Debt Collection Practices Act, 15 U.S.C. §1692 et seq. ("FDCPA"). The FDCPA broadly prohibits unfair or unconscionable collection methods; conduct which harasses, oppresses or abuses any debtor; and any false, deceptive or misleading statements, in connection with the collection of a debt; it also requires debt collectors to give debtors certain information. 15 U.S.C. §§1692d, 1692e, 1692f and 1692g.

VENUE AND JURISDICTION

- 2. This Court has jurisdiction under 15 U.S.C. §1692k (FDCPA), 28 U.S.C. §1331 and 28 U.S.C. §1337.
 - 3. Venue and personal jurisdiction in this District are proper because:
- Defendant's collection communications were received by plaintiff a. within this District;
 - Defendant transacts business within this District. b.

PARTIES

4. Plaintiff Anna-Katrina S. Christakis is an individual who resides in the Northern District of Illinois.

- Defendant Allied Collection Services, Inc. is a Nevada corporation. Its registered agent and office are Michael L. Feeney, 3080 S. Durango Dr., Ste. 208, Las Vegas, Nevada 89117.
- 6. Allied Collection Services, Inc. operates a collection agency and is engaged in the business of using the mails and telephone to collect consumer debts originally owed to others.
 - 7. Allied Collection Services, Inc. is a debt collector as defined in the FDCPA.

FACTS

- 8. Allied Collection Services, Inc. has been attempting to collect from plaintiff Anna-Katrina S. Christakis a purported debt incurred for personal, family, or household purposes. The debt is not owed.
- 9. On April 4, 2006 and again on July 2, 2007, plaintiff sent defendant letters informing it that she would not pay the purported debt and demanding cessation of further contact.
- 10. On multiple occasions during June-September 2007 plaintiff received telephone calls from defendant seeking to collect the debt.

VIOLATIONS COMPLAINED OF

11. Defendant thereby violated 15 U.S.C. §1692c.

WHEREFORE, the Court should enter judgment in favor of plaintiff and against defendant for:

- (1) Statutory damages;
- (2) Attorney's fees, litigation expenses and costs of suit;
- (3) Such other and further relief as the Court deems proper.

s/Daniel A. Edelman Daniel A. Edelman

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JURY DEMAND

Plaintiff demands trial by jury.

s/Daniel A. Edelman Daniel A. Edelman

NOTICE OF LIEN

Please be advised that we claim a lien upon any recovery herein for 1/3 or such amount as a court awards.

s/Daniel A. Edelman Daniel A. Edelman

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